

INTERNATIONAL  
**Food  
Additives  
Council**

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June 22, 2004

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, rm. 1061  
Rockville, MD 20852

RE: 97P-0056/CP 1

The International Food Additives Council (IFAC) is a U.S. based international association representing companies who produce high quality substances used as food additives, including soluble fibers.

In February 1997, the Calorie Control Council submitted a citizen petition requesting "that the Commissioner of Food and Drugs advise the food industry that it may use a caloric value of not more than 2 calories per gram for soluble fiber in food labeling, including Nutrition Facts labeling." This petition is not only important to the members of the Calorie Control Council but to the members of IFAC as well and IFAC, therefore, fully supports the Calorie Control Council petition.

Soluble fibers serve useful functions in foods and beverages and essentially all health/medical authorities addressing the issue encourage the consumption of fiber. For example, the Institute of Medicine of the National Academies in its final report, "Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein, and Amino Acids," funded in part by the FDA, states:

Fibers have different properties that result in different physiological effects. For example, viscous fibers may delay the gastric emptying of ingested foods into the small intestine, resulting in a sensation of fullness, which may contribute to weight control. Delayed gastric emptying may also reduce postprandial blood glucose concentrations and potentially have a beneficial effect on insulin sensitivity.

The IOM report also states that fiber is associated with reduced risk of coronary heart disease and "the greatest benefit comes from cereal fibers and viscous *Functional Fibers*, including gums and pectins."

Pectins and gums are soluble fibers and while in Chapter 7, "Dietary, Functional, and Total Fiber," of the IOM report does not refer to fiber as insoluble and soluble it does state, "While it is still unclear as to the energy yield of fibers in humans, current data indicate that the yield is in the range of 1.5 to 2.5 kcal/g."

97P-0056

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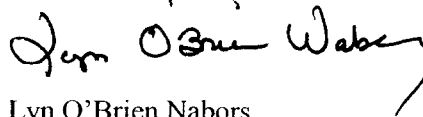
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While stating the health benefits of soluble fiber IOM notes "there is a seemingly large gap between current fiber intake and that which is recommended . . ."

With the current obesity epidemic and increase in diabetes, the consumption of soluble should be increased. Providing for the use of a more accurate (i.e., not more than 2 calories per gram) value for soluble fiber would both facilitate its incorporation in more food products and encourage more consumption.

IFAC urges the FDA to approve the Calorie Control Council's request that the agency allow the use a caloric value of not more than 2 calories per gram for soluble fiber in food labeling.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lyn O'Brien Nabors". The signature is fluid and cursive, with a long, sweeping tail on the last word.

Lyn O'Brien Nabors  
President

LON/jcr